

<u>Filed</u>	<u>Received</u>	<u>Entered</u>	<u>Served On</u>
Counsel/Parties of Record			
NOV 15 2024			
Clerk US District Court			
District of Nevada			
By:	Deputy		

Victor Camargo-Juarez
672 Brinkby Ave Apt 1607
Reno, NV 89509
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VICTOR CAMARGO JUAREZ

) CASE NO.: 3:21-cv-00064-ART-CSD

Plaintiff,

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)
)
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)
MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT WGS GROUP, INC.

vs.

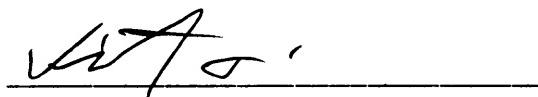
WGS GROUP, INC.;
DOES 1-10

Defendants.

)
)
)
)

Plaintiff VICTOR CAMARGO JUAREZ requests that the clerk of court enter default against defendant WGS GROUP, INC.; pursuant to Federal Rule of Civil Procedure 55(a). In support of this request plaintiff relies upon the record in this case and the affidavit submitted herein.

Dated this 15TH day of November, 2024.



VICTOR CAMARGO JUAREZ, Plaintiff in Pro Per

DATED: 11-15-24

DEBRA K. KEMPI, CLERK

Victor Camargo-Juarez
672 Brinkby Ave Apt 1607
Reno, NV 89509
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

) CASE NO.: 3:21-cv-00064-ART-CSD
VICTOR CAMARGO JUAREZ)
)
Plaintiff,)
)
)
)
vs.)
)
)
WGS GROUP, INC.;)
DOES 1-10)
)
Defendants.)
)
)
)

I, Plaintiff VICTOR CAMARGO JUAREZ, truthfully swears to, and states as follows:

1. I am the Plaintiff in Pro Per in the above-entitled action and I am familiar with the file, records, and pleadings in this matter.
2. The summons and complaint were filed on August 9, 2021 and January 28, 2021.
3. Defendant was served with a copy of the summons and complaint on September 27, 2021, as reflected on the docket sheet by the proof of service filed on September 27, 2021.
4. Defendant failed to file an answer to the complaint in any manner whatsoever since the date said summons and complaint were filed on
5. Defendant has failed to appear, plead or otherwise defend within the time allowed and, therefore, is now in default.

6. Plaintiff requested, and obtained, a request for entry of default in this case on

7. Plaintiff was unaware until October 30, 2024, that the court had, in fact, granted the request for entry of default because Plaintiff had never received notice of that entry.

8. Plaintiff wishes to advise the Court that he does intend to continue prosecution of this case in good faith. Plaintiff has every intention of continuing this case by way of making a timely motion for entry of default judgment by November 15, 2024, which was the date given to Plaintiff by the Court in the document titled _____ Document 25 Order To Show Cause _____ and dated _____ November 4, 2024 _____.

9. Plaintiff requests that the clerk of court enter default against the defendant, WGS GROUP, INC.; in the amount of \$50,000 (Fifty Thousand Dollars).

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge. I attest that the contents of this Affidavit were made in truth and good faith.

Dated: November 15, 2024



VICTOR CAMARGO JUAREZ, PLAINTIFF IN PRO PER

Victor Camargo-Juarez
672 Brinkby Ave Apt 1607
Reno, NV 89509
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VICTOR CAMARGO JUAREZ

Plaintiff,

vs.

WGS GROUP, INC.;
DOES 1-10

Defendants.

) CASE NO.: 3:21-cv-00064-ART-CSD
)
) ETNRY OF DEFAULT JUDGMENT AGAINST
) DEFENDANT WGS GROUP, INC.

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Plaintiff, VICTOR CAMARGO JUAREZ, requests that the clerk of court enter default against defendant WGS GROUP, INC.; pursuant to Federal Rule of Civil Procedure 55(a). It, appearing from the record that defendant has failed to appear, plead, or otherwise defend, the default of defendant (name) is hereby entered pursuant to Federal Rule of Civil Procedure 55(a).

Dated this 15th day of November, 2024.

Debra K. Kemp, Clerk of Court

Victor Camargo-Juarez
672 Brinkby Ave Apt 1607
Reno, NV 89509
Plaintiff in Pro Per

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

I, Virginia Juarez-Avina, hereby certify that I am over the age of 18, and am therefore of such age and discretion as to be competent to serve papers. I further certify that on this date I caused a copy of a Motion for Default Judgment, an Affidavit in Support of the Motion for Default Judgment, and a Proposed Default Judgment to be placed in a postage-paid envelope addressed to the defendant at the address stated below, which is the last known address of the defendant, and deposited the envelope in the United States mail.

USE THE DEFENDANT'S ADDRESS VICTOR-ON the proof of service

WGS GROUP, INC.;

ADDRESS

Dated this 15th day of November, 2024.

V.J.A.

Virginia Juarez-Avina

